

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MOBITV, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 21-10457 (LSS)

Jointly Administered

Objection Deadline: June 8, 2021 at 4:00 p.m. (ET)

Hearing Date: June 15, 2021 at 2:00 p.m. (ET)

**NOTICE OF FIFTH OMNIBUS MOTION FOR ENTRY OF ORDER
AUTHORIZING DEBTORS TO REJECT CERTAIN EXECUTORY CONTRACTS
PURSUANT TO 11 U.S.C. § 365, EFFECTIVE AS OF MAY 31, 2021**

PLEASE TAKE NOTICE that on May 28, 2021, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Fifth Omnibus Motion for Entry of an Order Authorizing Debtors to Reject Certain Executory Contracts Pursuant to 11 U.S.C § 365, Effective as of May 31, 2021* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that any responses to the Motion must be in writing and filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Third Floor, Wilmington, Delaware 19801, and served upon the undersigned, so as to be received on or **before 4:00 p.m. (Eastern Time) on June 8, 2021.**

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon: Counsel to the Debtors: (a) Pachulski Stang Ziehl & Jones LLP, 150 California Street, 15th Floor, San Francisco, CA 94111, Attention: Debra Grassgreen (dgrassgreen@pszjlaw.com) and Jason Rosell (jrosell@pszjlaw.com); and (b) Pachulski Stang

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor’s U.S. tax identification number are as follows: MobiTV, Inc. (2422) and MobiTV Service Corporation (8357). The Debtors’ mailing address is 1900 Powell Street, 9th Floor, Emeryville, CA 94608.

Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, DE 19801, Attention: Mary Caloway (mcaloway@pszjlaw.com); The Office of the United States Trustee for the District of Delaware: 844 King Street, Suite 2207, Wilmington, DE 19801, Attn: Benjamin A. Hackman (Benjamin.A.Hackman@usdoj.gov); Counsel to the Prepetition Lender: McGuireWoods LLP, 1251 Avenue of the Americas, 20th Floor, New York, NY 10020, Attn: Kenneth Noble (knoble@mcguirewoods.com); and Counsel to the Committee: Fox Rothschild LLP, 919 N. Market Street, Suite 300, Wilmington, DE 19801, Attn: Seth Niederman (sniederman@foxrothschild.com) and Michael Sweet (msweet@foxrothschild.com) and Gordon Gouveia (ggouveia@foxrothschild.com).

PLEASE TAKE FURTHER NOTICE THAT, IF AN OBJECTION IS PROPERLY FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, A HEARING WILL BE HELD ON JUNE 15, 2021 AT 2:00 P.M. (EASTERN TIME) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, UNITED STATES BANKRUPTCY JUDGE FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, COURT ROOM #2, SIXTH FLOOR, WILMINGTON, DELAWARE 19801. ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED WILL BE CONSIDERED BY THE BANKRUPTCY COURT AT SUCH HEARING.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

WHEREFORE, the Debtors respectfully request that the Court enter the Order, granting the relief requested herein, and such other relief as the Court deems appropriate under the circumstances.

Dated: May 28, 2021
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

Debra I. Grassgreen (admitted *pro hac vice*)

Jason H. Rosell (admitted *pro hac vice*)

Mary F. Caloway (DE Bar No. 3059)

919 North Market Street, 17th Floor

Wilmington, DE 19899-8705

Telephone: 302-652-4100

Facsimile: 302-652-4400

Email: dgrassgreen@pszjlaw.com

jrosell@pszjlaw.com

mcaloway@pszjlaw.com

Counsel to the Debtors and Debtors in Possession